

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

BOBBY COCHRAN,)
Plaintiff,) CIVIL ACTION NO. 3:10-CV-753
v.)
JP MORGAN CHASE, N.A.,)
Defendant.)
Judge Sharp
Magistrate Judge Griffin

**RESPONSE TO MOTION FOR LEAVE TO FILE MOTION
FOR ENLARGEMENT OF TIME**

Comes now, Defendant JP Morgan Chase, N.A. (“Defendant” or “Chase”) and for its response to Plaintiff’s Motion for Leave to File Motion for Enlargement of Time would state as follows.

Plaintiff initiated this action on August 9, 2010 by the filing of his Complaint, *inter alia*, against Chase. Subsequent to that filing, Plaintiff moved to amend his Complaint on March 15, 2011 and was subsequently granted such relief on April 6, 2011. Chase then filed its Answer to the Amended Complaint on April 25, 2011 after which the Court entered a scheduling order requiring all amended pleadings to be filed by June 27, 2011.

On the eve of the amended pleading deadline and the date upon which discovery should be propounded to be considered timely under the Court’s scheduling order, Plaintiff files his motion for leave asking for more time – but does not necessarily indicate what activity the Plaintiff intends to use the additional time for. As such, Chase opposes the motion for any enlargement of time that would allow the Plaintiff to amend his Complaint as he has already had two opportunities to plead his case – to which Chase has responded.

Furthermore, Chase is opposed to any enlargement of time for which discovery may issue as it has propounded its discovery requests upon Plaintiff within the time allotted by the Court's scheduling order.

Chase is not necessarily opposed to the Court granting additional time within which the Plaintiff may respond to Chase's written discovery requests so long as that extension does not overly delay the orderly progression of this case towards its conclusion.

Respectfully submitted,

s/James C. Bradshaw, III
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*Counsel for Defendant,
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing has been served upon the following, via Federal Express, on this the 6th day of July, 2011:

Bobby Cochran
7176 Chester Road
Fairview, Tennessee 37062

s/ James C. Bradshaw, III

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